

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 2055
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Re: ET Docket No. 04-186

I am writing to request that the Federal Communications Commission completes the final order in the Matter of Unlicensed Operation in the TV Broadcast Bands (ET Docket No. 04-186) in an expedited and timely manner.

As a provider of broadband services, SITCO, LLC is extremely interested in how to deploy affordable broadband to more Americans. Right now, the FCC has a unique opportunity to make currently unused spectrum available for last mile, broadband deployment. This spectrum is known as "white space." The unique characteristics of this spectrum make it ideal for providing service to rural and underserved areas, helping to connect the unconnected and providing new opportunities for education and economic growth in rural America. The availability of this valuable spectrum on an unlicensed basis also provides the opportunity to relieve increasing congestion in frequency bands currently available for unlicensed operations, including WiFi. Use of unlicensed spectrum has seen tremendous growth over the last few years and Americans have benefited greatly from being able to get connected easily and cheaply using unlicensed spectrum. That success, however, has lead to congestion in the unlicensed bands and this spectrum provides an ideal opportunity to meet the need for longer range operations.

This white space spectrum was originally made available for TV broadcast, but is not being used for that purpose in a given geographic area. The FCC has proposed rules to support use of this valuable, unused asset for unlicensed broadband applications starting in 2009.

Protecting over-the-air TV broadcast, wireless microphones, and others that have had assigned free access to this spectrum is key to optimizing this resource for everyone. Through a combination of digital technology, GPS location techniques and automatic sensing of potential interfering signals, cognitive, or "smart devices" can work in this spectrum without causing interference to licensed users. By combining these techniques, non-interference with devices protected by FCC rules can be assured.

On average, productively using this fallow resource would more than double the spectrum available for rural broadband and other unlicensed consumer applications. Due to the optimal propagation characteristics of this spectrum, one white space site can cover 10 to 100 times as much area as a WiFi Hot Spot, thus dramatically reducing the cost to bring broadband to underserved markets.

Thank you for consideration of this request and I look forward to the timely completion of the FCC's white space order to spur broadband deployment to underserved and unserved areas in my region and throughout the country.

Sincerely,

Tom Kolb
General Manager